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January 21, 2021

Via ECF

Hon. Sanket J. Bulsara, U.S.M.J
United States District Court
Eastern District of New York
225 Cadman Plaza, East, Chambers 304N
Brooklyn, NY 11201

Re: Marcos v. Café Riviera Inc. et al
Case No.: 19-cv-03981

Your Honor,

This office represents the Named Plaintiff as well as the putative class and collective in the above referenced action brought under the Fair Labor Standards Act (“FLSA”) and New York Labor Law (“NYLL”). We write to request an extension of time to file a deposition schedule in this case. Specifically, we are requesting an extension from January 22, 2021 until after the Court rules on Plaintiffs’ motion to compel, which is currently set for a hearing on February 9, 2021. The Plaintiffs believe that this extension will be beneficial to the litigation in that should the Court grant any part of the Plaintiffs’ motion it will almost assuredly necessitate a further deposition of all of the Defendants resulting in a waste of litigation resources. Once the Parties receive the Court’s Order on this pending motion and any compelled discovery is reviewed, the Parties will be able to meet and confer on a comprehensive deposition schedule.

Plaintiffs contacted Defendants regarding this motion however they failed to respond prior to filing.

Thank you.

Respectfully Submitted,
LAW OFFICE OF WILLIAM CAFARO

A handwritten signature in blue ink, appearing to read 'Amit Kumar', is positioned below the typed name.

By: Amit Kumar, Esq. (AK 0822)
*Attorneys for the Plaintiff and the Putative Class
and Collective*

CC:
All Attorneys of Record (via ECF)